

Remarks/Arguments:

Preliminary Matters

Claims 1-26 are presently pending. By this amendment, claim 1 is amended to include the limitations of claims 7 and 8. Support may be found throughout the specification as originally filed. For example, see page 6, lines 7-13; page 7, lines 28-29; page 8, lines 28-31; and FIGs. 1 and 2. Applicants contend that no new matter is added. Reconsideration is respectfully requested in view of the above amendments and the following remarks.

Claim Rejection Under 35 U.S.C. §112

Page 2 of the Office Action recites that "Claim 9 is rejected under 35 U.S.C. §112, second paragraph, as being indefinite" Applicants herein amend claims 5 and 9 to remedy the informalities. Applicants contend that this amendment obviates the rejection, and withdrawal of the rejection to claim 9 as indefinite is respectfully requested.

Claim Rejection Under 35 U.S.C. 102(b)

Page 2 of the Office Action recites that "Claims 1-6, 10-11, 14-16, and 18-22 are rejected under 35 U.S.C. 102(b) as being anticipated by Mann et al. (US Pat. 6,393,217, hereafter referred to as Mann)." Applicants respectfully submit that these claims are presently allowable over Mann for at least the reasons set forth below.

Independent claim 1, as amended, recites features that are neither disclosed nor suggested by Mann. These features include:

an array of stimulator elements arranged to be operated in a plurality of stimulator activation zone configurations so as to effect localised stimulation of said human body corresponding to each of said activation zone configurations; and

a user interface device including a selectable array of input zones corresponding to the activation zone array of the stimulator elements permitting a user to relate interface zones of the interface device to activation zones of the array of stimulator elements, wherein the apparatus is operable in a mode in which the activation zone configuration of the array of stimulator elements is selected independently of the user and the user uses the interface device to identify the activation configuration as perceived by the user by selecting respective input zones of said user interface device.

Mann discloses directional programming for implantable electrode arrays. Mann does not disclose or teach an apparatus for stimulation of the human body that includes a user interface device having "a selectable array of input zones corresponding to the activation zone array of the stimulator elements." Instead, on column 15, lines 4-8, 25-31, Mann discloses that electrodes are visualized on a display and that a stimulation field is maneuvered to selected electrodes using a joystick to provide directional control and "steer" electrical stimulus up or down the spinal cord. Applicants, however, describe on page 8, lines 19-21 (see also FIG. 1) that touch zones on a user interface device 5 corresponds to vibration actuators 2 on a corset 3, and tapping a selected touch zone causes a corresponding actuator 2 to vibrate.

Thus, Applicants submit that Mann fails to disclose, teach, or suggest each and every limitation of amended claim 1. As all claim limitations are unmet by Mann, withdrawal of the rejection of amended claim 1 as anticipated by Mann is respectfully requested.

Claims 2-6, 10-11, 14-16, and 18-22 are dependent on amended claim 1 and incorporate all the elements of claim 1. Therefore, claims 2-6, 10-11, 14-16, and 18-22 are allowable for at least the same reasons that claim 1 is allowable. Because Mann fails to disclose or teach each and every limitation of claim 1, withdrawal of the rejection of claims 2-6, 10-11, 14-16, and 18-22 is respectfully requested.

Page 5 of the Office Action recites that "Claims 1, 7, and 8 are rejected under 35 U.S.C. 102(b) as being anticipated by Sieracki et al. (U.S. Pat. 6,308,102, hereafter referred to as Sieracki)." Independent claim 1 is amended to include the limitations of claims 7 and 8. Applicants respectfully submit that these claims are allowable over Sieracki for at least the reasons set forth below.

Sieracki does not disclose, teach, or suggest an apparatus for stimulation of the human body that includes a user interface device having "a selectable array of input zones corresponding to the activation zone array of the stimulator elements." Instead, as shown in FIGs. 7A and 7B of Sieracki, an image of a body is illustrated on a screen of a user interface device. Sieracki discloses on column 13, line 67 - column 14, line 24 and column 16, lines 61-65, that a user draws on the image to indicate where sensation was felt on the body. Applicants show in FIG. 1, that the user interface has a selectable array of input zones that correspond to the activation zone array of the stimulator elements. Thus, Applicants submit that Sieracki fails to disclose or teach each and every limitation of amended claim 1. As all

claim limitations are not met by Sieracki, withdrawal of the rejection of amended claim 1 as anticipated by Sieracki is respectfully requested.

Claim Rejection Under 35 U.S.C. 103(a)

Page 6 of the Office Action recites that "claims 12, 13, 17, and 23-25 are rejected under 35 U.S.C. 103(a) as being unpatentable over Mann as applied to claims 1 and 11 above, and in further view of Brannon (U.S. Pat. 6,193,678, hereafter referred to as Brannon)." Applicants respectfully submit that these claims are presently allowable over Mann and Brannon for at least the reasons set forth below.

Brannon does not supply the disclosure that is missing from Mann and Sieracki. Claims 12, 13, and 17 include all the features of claim 1 from which they depend. Accordingly, Applicants submit that claims 12, 13, and 17 are also allowable for at least the reasons that claim 1 is allowable, and withdrawal of the rejection of these claims are respectfully requested.

Independent claim 23, as amended, although not identical to claim 1, recites features similar to claim 1. Because Mann and Brannon (either alone or in any proposed combination) fail to disclose or suggest all the features of amended claim 23, Applicants contend that claim 23 is allowable and, therefore, respectfully request withdrawal of the rejection of claim 23. Claims 24 and 25 depend from amended claim 23. Accordingly, Applicants submit that claims 24 and 25 are allowable, and withdrawal of the rejection of these claims is respectfully requested.

Page 8 of the Office Action recites that "Claims 23 and 26 are rejected under 35 U.S.C. 103(a) as being unpatentable over Sieracki as applied to claim 1, and in further view of Brannon." Applicants respectfully submit that these claims are presently allowable over Sieracki and Brannon for at least the reasons set forth below.

As described above, Sieracki and Brannon (either alone or in any proposed combination) fail to disclose or suggest all the features of amended claim 23. Claim 26 depends from amended claim 23. Accordingly, Applicants submit that claim 26 is allowable, and withdrawal of the rejection of this claim is respectfully requested.

Conclusion

In view of the above amendments and remarks, Applicants submit that this application is now in condition for allowance, which action is respectfully requested.

Respectfully submitted,



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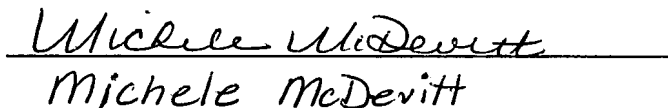
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